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Plaintiff in Pro Per

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,  
Plaintiff,  
vs.  
RIOT GAMES, INC.,  
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

*Hon. Fernando M. Olguin*

DECLARATION OF MARC  
WOLSTENHOLME

NOTICE OF AMENDED MOTION TO  
COMPEL, LIFT DISCOVERY STAY, AND  
FOR SANCTIONS. AND NOTICE OF  
EXTREME AND HARASSING CONDUCT  
CONCERNS.

Date: May 8, 2025  
Time: 10:00 am  
Crtrm: 6D

Dated this: April 28, 2025

M. WOLSTENHOLME  
[MARC WOLSTENHOLME]

1                   **DECLARATION OF MARC WOLSTENHOLME IN SUPPORT OF**  
2 **AMENDED MOTION**  
3                   **TO THE HONORABLE COURT, ALL PARTIES, AND THEIR**  
4 **ATTORNEYS OF RECORD:**  
5

6  
7                   Plaintiff Marc Wolstenholme hereby submits this Notice of Amended Motion  
8 correcting Dkt. Nos. 109, 111, and 112 to include proper hearing information.

9                   This amended filing further clarifies that Plaintiff's prior submissions did not  
10 disclose confidential settlement communications, but instead addressed serious misconduct and  
11 discovery violations that occurred during and in connection with the settlement process.  
12

13  
14                   Plaintiff respectfully requests that the Court accept this amendment, consider  
15 Plaintiff's pending motions to compel discovery, lift the discovery stay, and issue appropriate  
16 sanctions, on their merits.  
17

18  
19                   Plaintiff further submits that good cause exists to allow this amendment in the  
20 interests of justice, efficiency, and fair adjudication.  
21

**Apology and Explanation:**

Plaintiff respectfully apologizes to the Court and to Judge Olguin for any inconvenience caused by procedural mistakes and for contributing to a congested docket. The plaintiff is representing himself to the best of his ability but acknowledges that his filings have not always conformed to the Court's standards and that the reactive nature of stress and harassment has contributed to this. Plaintiff wishes to assure the Court that any errors were not made out of disrespect but rather stem from his ongoing efforts to learn the litigation process while also facing significant personal challenges, including Complex PTSD and dyslexia.

Plaintiff also notes that he is contending with targeted harassment and manipulation from Defendant's supporters, including public ridicule regarding his procedural mistakes, which further complicates his ability to litigate calmly and effectively. Despite these challenges, Plaintiff remains committed to proceeding in good faith, respectfully following the Court's guidance, and ensuring that the merits of the case — rather than procedural technicalities — are fairly addressed.

**Extreme and Harassing Conduct Concerns.**

Since the Plaintiff's last filing, just a few hours ago, he has received several targeted harassing messages mocking and aimed at building a sense of pressure, stress and reacting from Riot's cult and from Riot's legal team. Riot's Legal team insist on making me answer anything they say and do at any time no matter what I'm doing or where I am or what time of the night it is. I'm being harassed with improper conduct like "call me now" then "Call in the next few hours." After meet and confer dates and times have clearly been given. I can't even walk my dog in peace, I have had to cut short my walk, not cook dinner and come to my bed to send this as I've again been hit with emails to do whatever Riot wants right now whilst simultaneously being mocked by their cult.

Please see the email stream and see that no matter what I do or say, Riot will manipulate and pressure and harass it to do whatever they want and to abuse the procedures to pretend they are "Complying." How am I supposed to even operate under this aggression and unethical bullying, let alone litigate against a multibillion-dollar company with Military-civil fusion budgets, a Settlement Judge telling me Riot will eventually bully me out of proceedings and their cult targeting me, whilst I am a disabled litigant, experiencing hardship because of these infringements and others, with no qualifications or experiences in these matters and with a learning difficulty, and living on the opposite side of the world having to litigate at night against a company who clearly do not understand that "NO means NO.

1           **From Riot’s cult members**

2           **Email 1 Today**

3           *“17:06 (1 hour ago)*

4           *to me*

5           *Sent via form submission from M.W. Wolf’s Megaverse*

6           *Email: speedtest@lit.com, accepts marketing: false*

7           *Message: hold on I wanna see how fast you can file a motion clogging the dock*

8           *with irrelevant data*

9           *3 2 1 GO GO GO”*

10           **Email 2 Today**

11           *“Message: for the last time*

12           *its not "insider info"*

13           *is a fucking google search you moron*

14           *the case is open to the public.”*

15           **Between the Parties.**

16           **1, Marc Wolstenholme <marc@mwwolf-fiction.co.uk>**

17           25 Apr 2025, 21:05 (3 days ago)

18           to Josh

19           Subject: Re: Meet and Confer Regarding Dkts. 107 and 108

20           Dear Mr. Geller,

1 I am willing to meet and confer under Local Rule 7-3.

2  
3 However, I note that Dkt. 107 concerns judicial conduct, due process violations,  
4 and alleged misconduct during the settlement conference, which are not protected under  
5 settlement confidentiality rules when alleging judicial impropriety. Disclosure in this context is  
6 proper.  
7

8 Regarding Dkt. 108, while I understand your position, as a pro se litigant, I  
9 submitted additional evidence necessary to correct misrepresentations and to fully preserve the  
10 record given the serious procedural irregularities that have occurred.  
11

12 I am available for a telephonic meet and confer 04:00 Friday 2nd, in Los Angeles,  
13 CA, USA, which is 11 am in the UK, however I could make other UK business hour times as  
14 you have been making use of exhausting me than abusing and harassing late at night.  
15

16  
17 I am willing to make reasonable adjustments, yet please do not harass with back  
18 and forward emails.

19 Sincerely,

20 Marc Wolstenholm  
21

22  
23 **2, Geller, Josh**

24 16:44 (2 hours ago) to Aaron, me

25 Mr. Wolstenholme,  
26

Following up regarding our motion to strike – please note that we will be moving to strike each improper filing you have made or continue to make in the interim (that includes every filing up through Dkt. 117 filed a little while ago). The Court previously advised you to familiarize yourself with the Federal Rules of Civil Procedure and the Local Rules. You have not complied with that instruction. Your motions and other filings are defective for numerous reasons.

Additionally, we will be asking the Court to revoke your CM/ECF privileges. The Court previously warned you: “Plaintiff is hereby advised that if he continues to file random documents that have no basis in the applicable rules or court orders, the court shall revoke his privileges for electronic filing.” Dkt. 52. You have not complied with that instruction either.

I am available to meet and confer telephonically any of the next several days, including today, after 8:30 am PT / 4:30 pm BST. Regarding time zones, I will not be available at 4 am PT. I note that over the last several days, you have filed documents with the Court at the following times, all in Pacific Time: 9:09 am, 10:49 am, 12:53 pm, 2:22 pm, 3:02 pm, 3:10 pm, and 3:14 pm. Based on that, it is clear that you are available to discuss this case between the hours of 9 am and 3 pm Pacific Time. So please let me know when in that time range we can speak in the next few days. If you are unwilling to meet and confer telephonically, please let me know that instead.

**3, Marc Wolstenholme <marc@mwwolf-fiction.co.uk>**

17:23 (1 hour ago) to Josh

1 I can do Friday at like 5:30 GMT Or Monday the same time

2 Marc Wolstenholme <marc@mwwolf-fiction.co.uk>

3 17:27 (1 hour ago)

4 to Josh

5 Dear Josh,

6 I can do a Meet and Confer on Monday for all matters from both sides to  
7 streamline the process.

8 This includes all of the outstanding concerns over Discovery and Riots  
9 hatessment and abuse and radical clut members.

10 Thanks

11 Marc

12 **4, Geller, Josh**

13 17:28 (1 hour ago)

14 to me

15 Mr. Wolstenholme,

16 This is a very important matter. I am free to speak now. You can call me at  
17 310.312.3166, or please let me know the best number to reach you at. Alternatively I can speak  
18 tomorrow at 5:30 GMT. Please let me know.

19 **5, Marc Wolstenholme <marc@mwwolf-fiction.co.uk>**

20 17:36 (1 hour ago)

21 to Josh

1 What Matter? We have have a date and time for the meet and confer.

2 Are you ok? I'm walking my dog

3  
4 **6, Geller, Josh**

5  
6 17:40 (1 hour ago)

7 to me

8 Mr. Wolstenholme,

9 I apologize – maybe I misunderstood. If you are suggesting that we speak today  
10 (Monday) at 5:30 GMT, that is fine. Please call me then, or let me know the best number to call  
11 you at. I am free for the next several hours. I look forward to speaking soon.

12  
13 **7, Marc Wolstenholme <marc@mwwolf-fiction.co.uk>**

14 Attachments

15 17:45 (1 hour ago)

16 to Josh

17  
18 Next Monday or Friday. Its 6 at night and I'm not even at home. I can  
19 accommodate your hours (5.30) on Friday 2 of May or Monday 5th of May to discuss all matter  
20 of all meet and confer for both sides.

21  
22 **8, Geller, Josh**

23 19:14 (0 minutes ago)

24 to Aaron, me

25 Mr. Wolstenholme,

1 I requested your availability to meet and confer last week, and it is not reasonable  
2 to offer only times more than a week after we first requested to discuss. This has become a  
3 pressing issue given your repeated, improper, and prejudicial filings over the weekend  
4

5 I can make myself available tomorrow (4/29) or Wednesday (4/30) starting at 7  
6 am PT (3 pm UK time). Please identify a time that works for you in those windows. Otherwise,  
7 if you are not willing to engage in a timely meet and confer, we reserve the right to see ex parte  
8 relief.

9 I look forward to your prompt response.  
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**Declaration of Authenticity:**

I, Marc Wolstenholme, declare under penalty of perjury that the statements made  
are true and accurate

Executed on April 28, 2025, in Coventry, England.

Respectfully submitted,

Signature: *M. WOLSTENHOLME*

Marc Wolstenholme

Plaintiff in Pro Per

5 Shetland Close

Coventry, England CV5 7LS

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